

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

MDL No. 17-2795 (MJD/KMM)

**DECLARATION OF DANA J.
MOSS IN SUPPORT OF
DEFENDANTS' MEMORANDUM
OF LAW IN OPPOSITION TO
PLAINTIFFS' MOTION TO
COMPEL DISCOVERY**

I, Dana J. Moss, hereby declare as follows:

1. My name is Dana J. Moss and I am a Partner with the law firm of Cooley LLP. I am a member in good standing of the bars of Virginia and Washington D.C.

2. I submit this Declaration in support of Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Compel Discovery filed in the above captioned matter.

3. I have personal knowledge of the facts set forth in this Declaration.

4. As part of serving as counsel to CenturyLink Defendants ("CenturyLink"),

I am aware of [REDACTED]

[REDACTED]

[REDACTED]

5. I also served as counsel to CenturyLink in *State of Minnesota v. CenturyTel Broadband Services LLC*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.) ("MNAG Action").

6. The parties in the MNAG Action filed their Rule 26.06(c) Discovery Plan on October 6, 2017.

7. [REDACTED]
[REDACTED].

8. The State of Minnesota, by its Attorney General (“MNAG”) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

9. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10. [REDACTED]
[REDACTED]
[REDACTED]

11. [REDACTED]
[REDACTED]

12. [REDACTED]
[REDACTED]:

[REDACTED]

[REDACTED] **Exhibit 1.**

13. Counsel for CenturyLink [REDACTED]

[REDACTED]

[REDACTED]

14.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **Exhibit 2.**

15.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **Exhibit 3.**

16.

[REDACTED]

[REDACTED]

[REDACTED]

17.

[REDACTED]

[REDACTED]

18. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19. Plaintiffs suggest that CenturyLink [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *See* Plaintiffs' Memo. of Law in Supp. of
Their Mot. to Compel Discovery at p. 10 and Plaintiffs' Ex. U [REDACTED]

[REDACTED]

[REDACTED] **Exhibit 4.**

20. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

22. [REDACTED]

[REDACTED]

[REDACTED]

23. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

25. [REDACTED]

[REDACTED]

[REDACTED]

26. [REDACTED]

[REDACTED]

27. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

28. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I hereby declare under the penalty of perjury that the foregoing is true and correct.
Executed this 4th day of March 2020, in Washington, D.C.

s/ Dana J. Moss

Dana J. Moss